

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

No. 1:14-CR-306 - GBL

PEDRO ANTHONY ROMERO CRUZ,
JOSE LOPEZ TORRES,
JAIME ROSALES VILLEGAS,
ALVIN GAITAN BENITEZ,
CHRISTIAN LEMUS CERNA,
OMAR DEJESUS CASTILLO,
DOUGLAS DURAN CERRITOS,
MANUEL ERNESTO PAIZ GUEVARA,
JOSE DEL CID,
JESUS ALEJANDRO CHAVEZ,
Defendants

**MOTION FOR PROVISION OR ACCESS TO PSI AND PLEA
AGREEMENTS OF CO-DEFENDANTS OR OTHER INDIVIDUALS WHO
HAVE ENTERED OR AGREED TO ENTER GUILTY PLEAS IN
EXCHANGE FOR TESTIMONY**

Manuel Ernesto Paiz Guevara, by counsel, moves this Court to enter an Order for the provision or access to the PSI and plea agreements of co-defendants (or other individuals) who have entered or agreed to enter guilty pleas in exchange for their future testimony. Alternatively, we ask for an *in camera* review of such information.

This motion is made under Rule 16(d)(1) of the Federal Rules of Criminal Procedure (Court's authority to grant appropriate discovery relief upon showing of good cause), as well as his rights under the Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution, including his right to due process, to a fair trial, to confront the witnesses against him, and to present a defense, and judicial authorities construing said constitutional provisions (such as Brady v. Maryland, 373 U.S. 83, 87 (1963), United States v. Strifler, 851 F.2d 1197, 1202 (9th Cir. 1988); United States v. Carreon, 11 F.3d 1225, 1238 (5th Cir. 1994), Pennsylvania v. Ritchie, 480 U.S. 39, 51-53 (1987), United States v. Lindstrom, 698 F.2d 1154 (11th Cir. 1983), and Gonzalez v. Wong, 667 F.3d 965, 976 (9th Cir. 2011)).

Further law and arguments in support of this motion are set forth in the accompanying memorandum.

Respectfully submitted,

MANUEL ERNESTO PAIZ GUEVARA

By: _____/s/_____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was duly served via ECF, upon:

Stephen M. Campbell, Esq.
Julia K Martinez, Esq.
Tobias Tobler, Esq.
Assistant United States Attorneys
Eastern District of Virginia
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And all other defendants in this matter by the Court's electronic filing system.

W. Michael Chick, Jr. /s/